

MEMORANDUM

TO: DEFENDANTS' COUNSEL

FROM: MERRILL W. SHERMAN, SPECIAL MASTER

DATE: MARCH 30, 2012

RE: INFORMATION

Attached is a form to be completed for each case.

Counsel in each case shall confer with one another for any case with more than one defendant and complete the form attached as Exhibit A for each case jointly. Obviously, if there is only one defendant, the form should be completed by the named counsel without conferring with other counsel.

The requested information is to be submitted to me by May 1, 2012. It can be emailed to me at msherman@rispecialmaster.com or mailed to Special Master, 50 Holden Street, Suite 200, Providence, RI 02908.

EXHIBIT A

Case Caption

Docket No.

Counsel to Defendant(s)

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1. Is there a person or entity not named as a party defendant who is the real party in interest or who otherwise has a say/voice in the direction of the case and/or settlement of the case? YES / NO
If yes, please identify that party and counsel to such party, if any. _____

 2. Which party to the case has the authority to:
 - a. determine the price the mortgage holder will accept at a foreclosure sale? _____
 - b. determine the price at which a foreclosed property will be sold? _____
 - c. settle claims with other lien holders? _____
 - d. agree to a restructure of any financing on the property? _____
 3. For cases involving foreclosed property, does any party identified in #2 above have the authority or ability to enter into new financing with any defendant? YES / NO
 4. For any party identified in #2 above, provide the name, title and contact information of a person who, acting individually, can:
 - a. determine the price the mortgage holder will accept at a foreclosure sale? _____
 - b. determine the price at which a foreclosed property will be sold? _____
 - c. settle claims with other lien holders? _____
 - d. agree to a restructure of any financing on the property? _____
 5. Do you have appraisals or other opinions of value on the property?
If so, what are the dates? _____
Please produce copies of them.